

D. James Pak (SBN 194331)
BAKER & McKENZIE LLP
12544 High Bluff Drive, Third Floor
San Diego, CA 92130-3051
Telephone: +1 858 523 6200
Facsimile: +1 858 259 8290
D.James.Pak@bakermckenzie.com

Tod Gamlen (SBN 83458)
BAKER & McKENZIE LLP
660 Hansen Way
Palo Alto, California 94304
Tel: (650) 856-5504
Fax: (650) 856-9299
Tod.Gamlen@bakermckenzie.com

Steven M. Chasin (SBN 228723)
BAKER & McKENZIE LLP
815 Connecticut Avenue, N.W.
Washington, D.C. 20006
Tel: (202) 835-6132
Fax: (202) 416-7132
Steven.Chasin@bakermckenzie.com

Attorneys for Plaintiff And Counter-
Defendant SUPREMA, INC.

Brian E. Mitchell (SBN 199095)
Jigang Jin (SBN 239465)
MITCHELL + COMPANY, LAW OFFICES
4 Embarcadero Center, Suite 1400
San Francisco, CA 94111
Telephone: (415) 766-3515
Facsimile: (415) 402-0058
brian.mitchell@mcclawoffices.com
jigang.jin@mcclawoffices.com

Craig C. Daniel (SBN 212588)
David T. Wei (SBN 230729)
Art Sripipat (SBN 264753)
AXCEL LAW PARTNERS LLP
Four Embarcadero Center, 14th Floor
San Francisco, CA 94111
Telephone: 415-0704-8800
Facsimile: 415-704-8804
cdaniel@ax-law.com
dwei@ax-law.com
asripipat@ax-law.com

Attorneys for Defendant And Counterclaimant
SECUGEN CORPORATION

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SUPREMA, INC.,

Plaintiff,

v.

SECUGEN CORPORATION,

Defendant.

AND RELATED COUNTERCLAIMS

Case No. 11-CV-02783 WHA

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME FOR
SELECTION AND ENGAGEMENT OF
PRIVATE MEDIATOR**

STIPULATION

Subject to Court approval, Plaintiff and Counter-defendant Suprema, Inc. and Defendant and Counter-claimant SecuGen Corporation (collectively, the "Parties"), hereby stipulate, agree and

respectfully request that the September 30, 2011 deadline to select, clear, and engage a private mediator, as ordered in the Case Management Order, ¶ 2 (D.E 29), be extended by one week from Friday, September 30, 2011 to Friday, October 7, 2011.

The Parties are basing this stipulation on the following grounds, which they each believe constitute good cause. After the Case Management Conference held on September 15, 2011, various email communications were exchanged relating to mediation. The information in these communications had to be relayed by counsel to their respective clients, one of whom (Suprema) is located in Korea. As a result by Friday September 23 the Parties had not been able to agree on a mediator. On Monday, September 26, Craig Daniel, counsel for SecuGen responsible for mediator identification and selection for the defense, left for a pre-planned one week vacation and will not return until Monday, October 3 – this has made it challenging for the parties to complete the selection of the mediator by September 30. The parties jointly believe that a one-week extension of time will better facilitate the selection of appropriate mediator.

This requested extension will not alter any other dates or deadlines set by the Court.

September 27, 2011

Respectfully submitted,

BAKER & MCKENZIE LLP

MITCHELL + COMPANY, LAW OFFICES

BY:

BY:

/s/ Tod L. Gamlen
Tod L. Gamlen

/s/Brian E Mitchell
Brian E Mitchell


Attorneys for Plaintiff And Counter-Defendant SUPREMA, INC.

Attorneys for Defendant And Counterclaimant SECUGEN CORPORATION

ORDER ~~PROPOSED~~

PURSUANT TO STIPULATION, IT IS SO ORDERED. **There will be no more extensions.**

September 29, 2011.



Judge William Alsup

ATTESTATION OF CONCURRENCE BY TOD L. GAMLEN

I, Tod L. Gamlen, hereby attest that I am one of the attorneys for Plaintiff And Counter-Defendant SUPREMA, INC. and, as the ECF user and filer of this document, I attest that, pursuant to General Order No. 45(X)(B), concurrence in the filing of this document has been obtained from Brian E Mitchell, the above signatory.

Dated: September 28, 2011

By: /s/ Tod L. Gamlen

Tod L. Gamlen